

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

BARBARA MICHEL,
Plaintiff,

v.

**CHAD WOLF, Secretary, U.S. Department
of Homeland Security,
U.S. Department of Homeland Security,
U.S. Citizenship and Immigration Services,
MICHAEL J. MCCLEARY, Field Director,
U.S. Citizenship and Immigration Services,
Defendants.**

)
)
)
)
) **C.A. No. 20-10885-IT**
)
)
)
)
)
)
)
)

Consolidated for the Purpose of Briefing with

KARINE G. PIERRE BOUCICAUT,
Plaintiff

v.

**CHAD WOLF, Acting Secretary, U.S. Department of
Homeland Security; U.S. DEPARTMENT OF HOMELAND
SECURITY; U.S. CITIZENSHIP AND IMMIGRATION
SERVICES, and MICHAEL J. MCCLEARY, Field Office
Director, USCIS Boston Field Office.
Defendants.**

)
)
)
)
) **C.A. No. 20-10822-IT**
)
)
)
)
)
)
)
)

ANA MARISELA DIAZ SANCHEZ,
Plaintiff

v.

**CHAD WOLF, Acting Secretary, U.S. Department of
Homeland Security; U.S. DEPARTMENT OF HOMELAND
SECURITY; U.S. CITIZENSHIP AND IMMIGRATION
SERVICES, and MICHAEL J. MCCLEARY, Field Office
Director, USCIS Boston Field Office.
Defendants.**

)
)
)
)
) **C.A. No. 20-10922-IT**
)
)
)
)
)
)
)
)

FREDY FRANCISCO FUENTES,)	
Plaintiff,)	
)	
v.)	
)	C.A. No. 20-10978-IT
CHAD WOLF, Acting Secretary, U.S. Department of)	
Homeland Security; U.S. DEPARTMENT OF HOMELAND)	
SECURITY; U.S. CITIZENSHIP AND IMMIGRATION)	
SERVICES, and MICHAEL J. MCCLEARY, Field Office)	
Director, USCIS Boston Field Office.)	
Defendants.)	

JOSE ANGEL ANDRADE,)	
Plaintiff,)	
)	
v.)	
)	C.A. No. 20-10952-IT
CHAD WOLF, Secretary, U.S. Department)	
of Homeland Security,)	
U.S. Department of Homeland Security,)	
U.S. Citizenship and Immigration Services,)	
MICHAEL J. MCCLEARY, Field Director,)	
U.S. Citizenship and Immigration Services,)	
Defendants.)	

JOINT STATEMENT ON BRIEFING SCHEDULE

Pursuant to this Court’s Order, *see* Electronic Clerk’s Notes, ECF No. 27, *Michel v. Wolf, et al.*, C.A. No. 20-10885-IT, the parties agree that the five cases be consolidated under the caption of *Michel v. Wolf*. Defendants wish to rely on their motion to dismiss and legal memorandum in the matter of *Michel v. Wolf, et al.*, filed on September 25, 2020, for all five captioned matters. The Plaintiff will oppose the Defendants’ motion to dismiss as filed in the *Michel* case and the parties agree that Plaintiff will file her opposition to the motion to dismiss on or before October 15, 2020, that Defendants will file a response to the opposition by October 23, 2020 and that Plaintiff will only file a response if requested and permitted by the Court.

Defendants wish to rely on their pleadings in *Michel v. Wolf* because their memorandum in the case contains additional authority and argument that is not included in their motions on the three earlier cases. The Plaintiff agrees to file her opposition in the *Michel* case with all of her legal arguments which apply to all five cases pending before the court. The parties agree that the issues in all cases are the same and that the Court's ruling on the motions in *Michel v. Wolf, et al.* will govern the outcome in all five cases and that all other motions and replies in *Michel* and the other cases are stayed pursuant to the Court's order pending ruling on the Defendants' motion to dismiss and the Plaintiff's opposition.

Respectfully submitted,

Barbara Michel, et al.
By their Attorney,

/s/ Anthony Drago
Anthony Drago, Jr., Esq. (BBO #552437)
Anthony Drago, Jr., P.C.
35 India Street
Boston, MA 02110
(617) 357-0400
Anthony@adragop.com

ANDREW E. LELLING,
United States Attorney

By:

/s/ Anita Johnson
Anita Johnson
Assistant U.S. Attorney
U.S. Attorney's Office
John J. Moakley U.S. Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3266
Anita.johnson@usdoj.gov

LOCAL RULE 7.1 CERTIFICATION

I, Anthony Drago, Esq. do hereby state that Attorney Johnson and I have communicated regarding this Joint Statement.

/s/ Anthony Drago, Esq.
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I, Anthony Drago, Esq. do hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on October 5, 2020.

/s/ Anthony Drago, Esq.
Attorney for Plaintiff